

**AEROLINEAS
ARGENTINAS**

13103/ QA

Buenos Aires, October 29, 1996

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DEPARTMENT OF TRANSPORTATION
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Please find herein enclosed Aerolíneas Argentinas S.A. comments on the Proposed Rule for Passenger Manifest Information.

Technical difficulties, economic consequences and service quality to passengers are our main concerns, should this rule be approved.

It should be stated that most of our journeys are booked and sold through travel agencies and we do not have the authority to impose them the obligation to collect the required data.

Furthermore, our reservation system is not capable to include the required data. Therefore, its modification would imply a long and expensive process for our company.

This would result in the need to include a control system at the check-in, not only in the United States of America, but also in Argentina and in every other country Aerolíneas Argentinas operates fifth freedom right services from and to the United States of America.

It has been estimated that the workload needed to collect passenger manifest information for the flights in Argentina will be increased in about 20%. As a consequence, more personnel will be needed. Another problem will be the need of more counters, which are not always available at airports. This would result in heavy administrative and operational burden and would increase flight delays. Therefore, passengers will be affected and the economy of the operations will be damaged.

Our branch office in New York has estimated that the processing time of passengers will be increased in an average of 7 man/hours per flight with the subsequent increase of personnel and counters, space not always available at the terminal we operates at JFK.

While our operation in Los Angeles will be affected in a similar way, our situation in Miami will be even more serious since larger aircrafts and daily connecting flights, with change of gauge, to several points in the Caribbean, Mexico and Canada are operated.

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Should this rule be approved, it would be reasonable to assume that this procedure will be applied to all our passengers as well, and not only to U.S. citizens and lawful permanent residents of the United States of America, since in the infrequent event of an accident the same quality of information should be given to all our clients. This would imply, as previously stated, an even greater increase in administrative and operational burden.

It is our opinion that the cost-benefit relation is not adequate, Taking into account the high level of safety in our industry, in the very infrequent event of an accident outside the territory of the United States of America, the benefit will be small, compared to the unnecessary increase of the daily work, within the marketing chain.

It should also be stated that even though the best efforts are devoted to improve the facilitation of international airtransport, at national and international levels, this type of proposals act as a deterrent to such efforts and impose greater liabilities to passengers and air carriers.

Furthermore, Chapters 2 and 3 of ICAO's Annex 9, establish that governmental provisions and procedures applicable to the dispatch of aircrafts and passengers should not be less favourable than those applied to other means of transport, among other recommended practices and standards aimed to simplify and facilitate the entry and exit of aircrafts and passengers.

It is our opinion that this proposal is inconsistent with the recommended practices and methods issued by ICAO.

In view of the abovementioned, we do believe that the proposed rule will seriously affect our company and clients compared to the minimum benefits to be obtained, should an accident accurs.

We perfectly understand the problems related to an event of an accident in this activity, but we consider that the practices nowadays in force are adequate to face this kind of problem without the need of implementing regulations as the proposed one.

Thanking you for the attention paid to our comments.

Respectfully submitted,



LIC. GUSTAVO DONISA
GERENCIA DE POLITICA AEREA